

# Hospital Pharmacy “Dirty Dozen”

The following are the most frequently cited deficiencies from hospital pharmacy inspections conducted during the period of 2001 – 2002.

## **54.1-3404 & 18 VAC 110-20-240 - Records**

- Inventory does not separate drugs in Schedule II from those in Schedules III – V.
- Inventory is not signed, dated, or indicate if taken at opening or closing of business.
- Record of receipt of Schedule III-V drugs is not dated with the actual date of receipt.
- Distribution/administration record for Schedule II – V drugs does not separate drugs in Schedule II from those in Schedules III – V (ie: all schedules combined on a single 24 hours controlled substance administration record)

## **54.1-3434.02 & 18 VAC 110-20-490 - Automated devices for dispensing and administration of drugs.**

- At the time of loading, the delivery record for all Schedule II through V drugs are not signed by a nurse or other person authorized to administer drugs from that specific device. The record is not returned to the pharmacy and maintained in chronological order for a period of two years from date of delivery.
- The pharmacist-in-charge or his designee have not conduct at least a monthly audit and review of all distribution and administration of Schedule II through V drugs from each automated dispensing device. The audit did not reconcile the quantities loaded into the device and still on hand with the quantities removed from the device for administration.
- Random checks are not made to ensure that a valid order exists for each dose administered. The hard-copy distribution records printed out and reviewed in the audit are not initialed and dated by the person conducting the audit and are not maintained in the pharmacy for a period of two years.

## **18 VAC 110-20-355 - Pharmacy repackaging of drug; records required; labeling requirements.**

- Record not maintained for all repackaged drugs.
- Repackaging records do not include required information: date packaged, drug, strength, quantity, lot/control number, manufacturer/distributor name and lot/control number, expiration date, signature of pharmacist supervising the process.
- Expiration date of repackaged drug exceeds 6 months.

## **18 VAC 110-20-460 - Floor stock drugs; proof of delivery; distribution records.**

- The record of disposition/administration used to document administration of Schedule II through V drugs when a floor stock system is used for such drugs are not returned to the pharmacy within three months of its issue.
- The pharmacist-in-charge or his designee does not 1) match the record to the receipt 2) periodically audit record for completeness 3) verify information of the record 4) initial or sign the record 5) file chronologically 6) maintain the record for 2 years.

## **18 VAC 110-20-470 - Emergency room.**

- A separate record is not maintained on all drugs, including drug samples, dispensed in the emergency room.
- The record of drugs dispensed in the emergency room is missing one of the following elements: Date and time dispensed; patient's name; prescriber's name; name of drug dispensed, strength, dosage form, quantity dispensed, and dose.
- Drugs are dispensed by a nurse rather than a medical practitioner.

**18 VAC 110-20-450 - After-hours access to the pharmacy.**

- The record of drugs removed from the pharmacy after hours did not include the required information: 1) date of withdrawal; 2) patient's name; 3) name of the drug, strength, dosage form and dose prescribed; 4) number of doses removed; 5) signature of the authorized nurse.

**18 VAC 110-20-420 - Unit dose dispensing system.**

- The cart fill record is not initialed by the pharmacist checking the cart.
- The patient's individual drawer is not labeled with the patient's name and location.

**18 VAC 110-20-500 - Licensed emergency medical service agencies program.**

- The record of drugs administered is not signed by the medical practitioner who assumes responsibility for the patient at the hospital.

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**18 VAC 110-20-200 - Storage of drugs, devices, and controlled paraphernalia.**

- Expired drugs were not consistently separated from the stock used for dispensing and maintained in a designated area within the prescription department until proper disposal.

**18 VAC 110-20-150 - Physical standards for all pharmacies.**

- The pharmacy did not have a working thermometer in the drug storage refrigerator.
- The refrigerator temperature is outside the acceptable range.
- There is no hot water.

**18 VAC 110-20-330 - Labeling of prescription as to content and quantity.**

- When filling outpatient prescriptions, the generic name of the drug is not included on the label for any drug product possessing a single active ingredient.

**18 VAC 110-20-520 - Drugs in long term care facilities.**

- Drugs, other than those in the stat or emergency box, are floor stocked in a long term care facility.